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January 16, 2025

Via ECF FILING

Honorable Judge Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: William Kostroun v. Jomboy Corp. / No. 1:24-cv-09466 (CM) / Letter Motion for Extension

Dear Judge McMahon:

We are attorneys for defendant Jomboy Corp. (“Jomboy”) in the above-referenced copyright action, which was filed on December 12, 2024 (Docket No. 1). The undersigned has filed an appearance and Rule 7.1 Disclosure Statement on behalf of Jomboy.

Plaintiff’s counsel of record, Craig B. Sanders, Esq., has consented to an extension of Jomboy’s time to answer or move with respect to the Complaint until February 20, 2025, which is 30 days after Jomboy’s response would otherwise be due on January 21, 2025. The parties have also initiated a settlement dialogue, which the parties believe would benefit from the requested extension. This the first extension sought for Jomboy. The requested extension does not affect any other scheduled dates.

Accordingly, we respectfully request that Jomboy’s time to answer, move or otherwise respond to the complaint be extended to February 20, 2025. There has been no previous request for such extension.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Barry Werbin".

Barry Werbin

(via ECF)